

# Cooley

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The Honorable Michael B. Kaplan  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fisher U.S. Courthouse  
402 East State Street, Courtroom #8  
Trenton, New Jersey 08608

Dear Judge Kaplan:

We write on behalf of the Official Committee of Talc Claimants II ("TCC II") regarding the proposed mediation among the Debtor, the Official Committee of Talc Claimants I ("TCC I"), and TCC II.

Based on statements made at hearing convened in these matters on March 8, 2022 (the "Hearing"), TCC II understands that the Debtor and TCC I agreed upon a mediation protocol that includes two co-mediators, Gary Russo and the Honorable Joel Schneider (ret.). As we expressed to the Court at the Hearing, neither TCC I nor the Debtor consulted with TCC II prior to the Hearing with respect to the mediation protocol, or the number and identity of the proposed mediators. As such, the Court appointed the co-mediators without prejudice to the rights of TCC II to challenge the agreement reached between the Debtor and TCC I.

Following the Hearing, TCC II deliberated on the topic of the proposed mediation process. TCC II hereby confirms that it will not interpose an objection to the selection of the co-mediators. In the interests of efficiency and cooperation, and to provide for the immediate commencement of negotiations, TCC II has concluded that it will support the appointment of Messrs. Russo and Schneider as co-mediators, and will not be seeking the appointment of additional mediators at this time. However, TCC expressly reserves the right to seek further relief from the Court if circumstances meaningfully change.

We look forward to discussing the mediation protocol at the hearing scheduled for March 16, 2022.

Respectfully submitted,

*/s/ Cullen D. Speckhart*

Cullen D. Speckhart

CDS